

*Log in for 14 Aug 95  
14 Aug 95*

INFORMAL MEMO

DATE: August 8, 1995  
TO: D. Lindsay, OCC  
FROM: D. George *[Signature]* EP-ERG

SUBJECT: OU 11 Corrective Action Decision/Record of Decision

Please have a member of your staff review the attached Preliminary Draft Corrective Action Decision/Record of Decision for Rocky Flats Environmental Technology Site, Operable Unit 11, West Spray Field.

Please provide comments to me by August 22, 1995. If you or your staff have any questions, please contact me by CC:Mail or call at x5669. Thank you for your support on this project.

cc: R. Schassburger  
J. Wienand

*Dave:*

*Please write editorial comments  
in green ink.*

*Trutwell  
OCC  
14 Aug 95*



ADMIN RECORD

BZ-A-000512

**INFORMAL MEMO**

DATE: August 10, 1995  
TO: L. Ekman, HQ, EM-452  
FROM: D. George, RFFO, EP-ERG



SUBJECT: OU 11 Corrective Action Decision/Record of Decision

Please review the attached Preliminary Draft Corrective Action Decision/Record of Decision for Rocky Flats Environmental Technology Site, Operable Unit 11, West Spray Field.

Please provide comments to me by August 22, 1995. If you or your staff have any questions, please contact me by CC:Mail or call at (303) 966-5669. Thank you for your support on this project.

cc: R. Schassburger  
J. Wienand



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**cc:Mail for: DAVE GEORGE**

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Dave,

This looks good; my only comment is that I just reviewed OU15 ROD and it says the buffer is 6150 acres ...let's be consistent since they will be going out so close together. Also was glad to see that the contractor-writers did not reinvent the wheel in the generic narrative.

I'd say it looks good to go!

Lea

Dave, I have reviewed the above-referenced document and have the following comments:

DECLARATION:

- (1) "Statement of Basis and Purpose" - Recommend adding reference to 1984 HSWA amendments to RCRA since this is (primarily) where corrective action provisions reside. This document is also a CAD.
- (2) "Statement of Basis and Purpose" and "Description of the Selected Remedy" - Recommend deletion of "preferred alternative". Recommend using either "alternative" or "selected alternative" in the ROD/CAD, especially since there was no FS/CMS conducted for OU 11.
- (3) "Declaration Statement" - Recommend modifying second sentence to read as:  
  
"Because the remedy will not result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, five year reviews per Section 121 of CERCLA are not required."

This language is more consistent with that in the NCP and CERCLA Section 121(c).

DECISION SUMMARY:

- (1) "Site Characteristics" paragraph 1, page 4 - The third sentence states that "the bedrock underlying Rocky Flats can be considered an aquitard" is not true at OU 2. Recommend making this statement specific to OU 11, if true.
- (2) "Site Characteristics" paragraph 2, page 4 - What is a PCOC versus a COC? It is my understanding that the BRA in the RFI/RI was geared toward the identification of COCs. If PCOC is the same as a COC, recommend using COC. If PCOC is not the same as a COC, then drop reference to PCOC entirely. A flowchart for the COC selection process was jointly agreed to among DOE, EPA and the State. Was this used at OU 11? Finally, at the time of a ROD/CAD, there should not be PCOCs; instead there should either be COCs or no COCs.

Recommend comparison between maximum media concentrations and PPRGs under the human health portion of the "Summary of Site Risks". ~~disregard~~

Recommend segregation of media (i.e., surface soil, vadose zone, and groundwater). The text, as written, is somewhat difficult to follow. Also recommend inclusion of maximum concentrations for COCs for each of the three media. Even if there are no groundwater COCs, a discussion of maximum surface soil and/or vadose zone COCs concentration in groundwater is appropriate.

Recommend discussion of fate and transport after discussion of COCs and media concentrations, as is currently the case.

- (3) "Summary of Site Risks" - Recommend inclusion of two paragraphs; one to discuss human health risks and the other for ecological risk. Recommend that discussion of PPRGs relative to media concentrations be placed in this section. In addition, it would not be a bad idea to compare NO3 concentrations in groundwater, if any, to the SDWA MCL of 10mg/l (NO3 as N).

I believe the one sentence "discussion" of the ecological risk screen to be insufficient. Recommend that this be expanded to a reasonable amount. Summarize the screening process and the results so that the reader can have some confidence that there are "no significant ecological effects".

With regard to ARARs, was the maximum Pu concentration of 2.2 pCi/g in surface soil or in the vadose zone. The CDPHE construction standard for Pu in soil is 0.9 pCi/g. What is DOE's position on this standard as an ARAR? Did DOE agree to consider this as an action-specific ARAR? If so, is this an issue for the ROD? There is a very high likelihood that this area will be mined for sand and gravel in the near future.

United States Government

Department of Energy  
Rocky Flats Field Office

# memorandum

DATE: AUG 22 1995

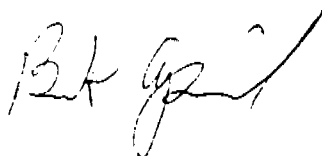
REPLY TO  
ATTN OF: EGD:DM:12918

SUBJECT: Environmental Guidance Division's Review of the Operable Unit 11 Draft Decision Document

TO: Jessie Roberson, Assistant Manager for Environmental Programs, RFFO

This memorandum is to inform you that the Environmental Guidance Division (EGD) has reviewed the document entitled, "Preliminary Draft Corrective Action Decision/Record of Decision (CAD/ROD) for Operable Unit 11: West Spray Field (IHSS 168)." This document appears to follow guidance issued by the Environmental Protection Agency on this matter and contains the required information. Therefore, EGD does not have comments, at this time.

If you have any questions regarding this memorandum please contact Debbie Mauer, of my staff, at extension 5598.



Bob April, Director  
Environmental Guidance Division

Attachment

cc:  
D. Mauer, EGD, RFFO  
D. George, EP, RFFO

# FAX

**From Tim Reeves  
SAIC TMSS Golden Group  
Phone: 273-1250**

**Environmental Restoration  
DOE/Rocky Flats Field Office  
Fax: 279-5525**

**August 22, 1995**

**To: Dave George  
DOE, ER, RFFO  
Fax No: 966-7447**

Enclosed are technical comments for the OU 11 Draft ROD as was requested via the work assignment ER-95-218. These comments were submitted ASAP as you requested in our phone conversation of 8/22 when you indicated that the September 29 completion date on the Work Assignment was an error.

If you have any questions, please call me at 273-1250.

Sincerely,



**Tim Reeves**

cc:  
T. Greengard, SAIC  
J. Stewart, SAIC

**Technical Review Document  
OU-11 Draft ROD**

**SAIC/Environmental Restoration  
Comments and Recommendations to Environmental Restoration RFFO  
August 1995**

**General Comments**

1. The document is not well written and needs to be thoroughly reviewed by a technical editor. There are several examples of unclear sentences which do not simply present the subject. The last sentence of the Scope and Role of OU 11 within Site Strategy section is an example of an unclear sentence.
2. Section 300.430(f)(5)(ii)(A) of the NCP indicates that the ROD shall describe how the remedy is protective of human health and the environment, explaining how the remedy eliminates, reduces, or controls exposure to human health and the environment. This mandate is attempted in the Site Characteristics Section on page 4 and the Summary of Site Risks section on page 5. These sections are not definitive and clear.
  - a. The Site Characteristics section makes several statements that are not substantiated and/or referenced. Example: "The higher than normal plant biomass and lack of elevated levels of nitrate/trite in ground water indicates...." Are these statements and the following statements concerning tritium and the adsorption of Pu to soil conclusions of the RI report or a study? The statements and conclusions in this section must be carefully substantiated, properly referenced and backed up. This section as a whole must be very clear, documenting the lack of risk pathways for these contaminants.
  - b. The Summary of Site Risks needs to emphasize what the calculated risks were for the COCs and emphasize these data compared to the  $10^{-6}$  departure criteria as discussed in the NCP 300.430(e)(i)(A)(2). Reference and summarize the data from the screening level risk assessment. The CDPHE conservative screen is not a quantitative evaluation of risk but only a qualitative tool that is unique to Rocky Flats. It is not a technically recognized and peer reviewed quantitative risk calculation and is not known outside of Rocky Flats. Although it is worth mentioning, it should not be over emphasized as definitive data proving that there is no risk at OU 11.
3. The term "protective state" is used regularly throughout the ROD. Example: "...OU 11 is in a protective state". It would be much clearer to simply state something like "the concentrations of contaminants detected at OU 11 do not pose a risk and are considered protective of human health and the environment". The phrase "OU 11 is in a protective state" is unclear.
4. Use of the term PCOC. Why are the chemicals/contaminants of concern still referred to as "Potential" COCs in the ROD. The final list of COCs should have been documented for the OU or by now are administratively understood. It is suggested that they be referred to as COCs.

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Best Available Copy



5. The comparisons of mean concentrations to "Preliminary" Remediation Goals needs to be clarified. It should be stated that the PRGs were not modified through the RI/FS process for OU 11 and are essentially the Remediation Goals that the remedy is based on. The term Preliminary insinuates that they can still change.
6. The Scope and Role of OU 11 within Site Strategy section appears to add no value to the ROD. There is no legal or technical purpose for a ROD to state that the milestones and reports were completed according to an IAG.